

POMERANTZ LLP

Jeremy A. Lieberman (pro hac vice)

Austin P. Van (pro hac vice)

600 Third Avenue, 20th Floor

New York, NY 10016

Telephone: (212) 661-1100

jalieberman@pomlaw.com

avan@pomlaw.com

Jennifer Pafiti (SBN 282790)

1100 Glendon Avenue, 15th Floor

Los Angeles, California 90024

Telephone: (310) 405-7190

jpafiti@pomlaw.com

Counsel for Lead Plaintiffs

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PLUMBERS AND STEAMFITTERS
LOCAL 60 PENSION TRUST, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

META PLATFORMS, INC., MARK
ZUCKERBERG, DAVID WEHNER,
SHERYL SANDBERG, and SUSAN LI,

Defendants.

CASE NO. 4:22-cv-01470-YGR

**LEAD PLAINTIFFS' NOTICE OF
VOLUNTARY DISMISSAL OF DEFENDANT
SUSAN LI PURSUANT TO FED. R. CIV. P.
41(a)(1)(A)(i)**

Hon. Yvonne Gonzalez Rogers

1 Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Lead Plaintiffs
2 voluntarily dismiss Defendant Susan Li from the above-captioned action without prejudice. *See*
3 *Pedrina v. Chun*, 987 F.2d 608, 610 (9th Cir. 1993) (holding that plaintiffs have an “absolute right”
4 to voluntarily dismiss individual defendants “without prior leave of court” prior to defendants’
5 filing an answer or a motion for summary judgment); *accord United States v. Real Prop. Located*
6 *at 475 Martin Lane, Beverly Hills, CA*, 545 F.3d 1134, 1145 (9th Cir. 2008). Defendant Li has not
7 filed an answer or a motion for summary judgment. For the avoidance of doubt, Plaintiffs do not
8 voluntarily dismiss any other Defendants from the above-captioned action, and the schedule for
9 the remaining Defendants to respond to the Amended Complaint should remain unchanged.

10 Dated: October 4, 2022

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman (admitted *pro hac vice*)

Austin P. Van (admitted *pro hac vice*)

600 Third Avenue, 20th Floor

New York, New York 10016

Telephone: (212) 661-1100

Facsimile: (917) 463-1044

E-mail: jalieberman@pomlaw.com

avan@pomlaw.com

Jennifer Pafiti (SBN 282790)

1100 Glendon Avenue, 15th Floor

Los Angeles, California 90024

Telephone: (310) 405 7190

Facsimile: (917) 463 1044

jpafiti@pomlaw.com

Orly Guy

Eitan Lavie

HaShahar Tower

Ariel Sharon 4, 34th Floor

Givatayim, Israel 5320047

Telephone: +972 (0) 3 624 0240

Facsimile: +972 (0) 3 624 0111

E-mail: oguy@pomlaw.com

eitan@pomlaw.com

Attorneys for Lead Plaintiffs